

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER
ESSENTIALS, INC., ROCKSTAR
CHAMPIONSHIPS, LLC, JEFF &
CRAIG CHEER, LLC, d/b/a JEFF
AND CRAIG CAMPS, and ASHLEY
HAYGOOD, Individually and on
Behalf of all Others Similarly Situated,
Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN
SPORTS, LLC, VARSITY SPIRIT,
LLC, STANBURY, LLC, HERFF
JONES, LLC, BAIN CAPITAL, LP,
CHARLESBANK CAPITAL
PARTNERS, LLC, VARSITY
BRANDS HOLDING CO., INC.,
VARSITY SPIRIT FASHION &
SUPPLIES, LLC, U.S. ALL STAR
FEDERATION, INC., USA
FEDERATION FOR SPORT
CHEERING, d/b/a USA CHEER,
VARSITY INTROPA TOURS, LLC
and JEFF WEBB,

Defendants.

CIVIL ACTION
FILE NUMBER:
2:20-cv-02782-SHL- tmp

**MOTION TO COMPEL AND
FOR SANCTIONS**

Pursuant to and Fed. R. Civ. P. 37 and the Court's June 1, 2021 Order requiring production, the American Spirit Plaintiffs move to compel production and for sanctions with effect.

Respectfully submitted,

This 9th day of February 2022.

s/ Robert A. Falanga
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Attorney Bar No. 254400
Interim Lead Class Counsel

s/ Kobelah Svensen Bennah
Kobelah Svensen Bennah
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